IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

)
)) Case No. 1:16-cv-10708
) Mag. Judge Sidney I. Schenkier)
)

JOINT MOTION FOR SETTLEMENT APPROVAL AND DISMISSAL WITH PREJUDICE

The parties, by and through their attorneys of record, hereby moves this Court for an Order granting the parties' Joint Motion for Settlement Approval and Dismissal with Prejudice. Specifically, the parties request that the Court: (1) approve the proposed settlement as fair, reasonable, and an adequate resolution of a bona fide dispute under the Fair Labor Standards Act; (2) approve attorneys' fees as specified in the parties' Settlement Agreement and Release of Claims; (3) approve out-of-pocket costs in the amount of \$2,624.47; and (4) dismiss this matter with prejudice.

This motion is based upon the parties' Memorandum in Support, the Declarations of Jason D. Friedman and Michele R. Fisher with exhibits, and all of the files, records and proceedings herein, as well as further points and authorities presented to this Court.

Dated: April 2, 2018

NICHOLS KASTER, PLLP

/s/Michele R. Fisher

Michele R Fisher, MN Bar No. 303069 Jason D Friedman, 4600 IDS Center 80 South Eighth Street Minneapolis, MN 55402 Telephone: (612) 256-3200 fisher@nka.com jfriedman@nka.com *Admitted Pro Hac Vice

JAC A. COTIGUALA & ASSOCIATES

Jac A. Cotiguala 431 Dearborn Street, Suite 606 Chicago, IL 60605 Telephone: (312) 939-2100 jac@wageandhour.com

ATTORNEYS FOR PLAINTIFFS

OGLETREE, DEAKINS, NASH, SMOAK & STEWART P.C.

/s/Colleen G. DeRosa

Michael H. Cramer, ARDC No. 6199313 Colleen G. DeRosa, ARDC No. 6301589 155 North Wacker Drive, Suite 4300 Chicago, IL 60606 Telephone: (312) 558-3028 michael.cramer@ogletreedeakins.com colleen.derosa@ogltreedeakins.com

OGLETREE, DEAKINS, NASH SMOAK & STEWART, P.C

Michael D. Ray ARDC No. 6285109 201 South College Street, Suite 2300 Charlotte, NC 28244 Telephone: (704) 342-2588 michael.ray@ogletreedeakins.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above was filed electronically on April 2, 2018 pursuant to the service requirements of the ECF/CM for the Northern District of Illinois, which will notify all counsel of record.

/s/Michele R. Fisher